

Attorney or Party Name, Address, Telephone & FAX Nos., State Bar No. & Email Address  LORI J. ENSLEY ROBERT F. BICHER ROBERT F. BICHER & ASSOCIATES 1220 Monte Vista Dr. Redlands, CA 92373 Mailing Address: P.O. Box 7010, Redlands, CA 92375  Telephone: (909) 793-8068 Email: rfbicher@earthlink.net  Field Agent and Forensic Analyst for Chapter 7 Trustee, <del>RICHARD A. MADSEN</del> <input checked="" type="checkbox"/> Individual appearing without attorney Attorney for: <input type="checkbox"/>	FOR COURT USE ONLY
<b>UNITED STATES BANKRUPTCY COURT CENTRAL DISTRICT OF CALIFORNIA - SANTA ANA DIVISION</b>	
In re:  THE LITIGATION PRACTICE GROUP P.C.,          Debtor(s).	CASE NO.: 8:23-bk-10571-SC <input type="checkbox"/> CHAPTER: 11
	<b>APPLICATION FOR PAYMENT OF:</b> <input type="checkbox"/> <b>INTERIM FEES AND/OR EXPENSES (11 U.S.C. § 331)</b> <input checked="" type="checkbox"/> <b>FINAL FEES AND/OR EXPENSES (11 U.S.C. § 330) SUPPLEMENT</b>
	DATE: January 14, 2025 TIME: 10:00 a.m. COURTROOM: 5C <input type="checkbox"/> PLACE: United States Bankruptcy Court <input type="checkbox"/> 411 West Fourth Street <input type="checkbox"/> Santa Ana, California 92614 <input type="checkbox"/>

1. Name of Applicant (*specify*): Robert F. Bicher & Associates ☐
2. Type of services rendered:
  - a. ☐ Attorney for (*specify*): \_\_\_\_\_
  - b. ☐ Accountant for (*specify*): \_\_\_\_\_
  - c. ☒ Other professional (*specify*): Field Agent and Forensic Analyst for Chapter 11 Trustee ☐
3. Date of filing of petition under chapter 11 ☐ of the Bankruptcy Code: 03/20/2023
4. Date of entry of Order Approving Applicant's Employment: 06/07/2023
5. Date of filing of last Fee and/or Expense Application: 08/29/24

This form is optional. It has been approved for use in the United States Bankruptcy Court for the Central District of California.

6. Total fees allowed or paid to Applicant to date (including retainers and prior approved fee applications): \$ \_\_\_\_\_

**this is a supplement  
please see Dk. No.  
1889 for detail**

a. Retainer received: \$ \_\_\_\_\_

b. Retainer remaining as of the date of this Application: \$ \_\_\_\_\_

c. Total amount requested in all prior applications: \$ \_\_\_\_\_

d. Total amount actually paid pursuant to prior approved applications: \$ \_\_\_\_\_

e. Total amount currently due but unpaid pursuant to prior approved applications: \$ \_\_\_\_\_

f. Total amount allowed but reserved pending final fee application: \$ \_\_\_\_\_

7. **Summary of Requested Fees:** (attach detailed supporting documentation to this Application)

Professional Person's Name	Hourly Rate	X	Total Hours this Person	=	Total Fees this Person
a. Robert F. Bicher - Fee Applications	\$ 300.00	X	7.90	=	\$ 2,370.00
b.	\$	X		=	\$
c.	\$	X		=	\$
d.	\$	X		=	\$
e.	\$	X		=	\$
f.	\$	X		=	\$

g. ☐ Continued on attached page

8. The hourly rates above are the same rates charged by the above professionals for non-bankruptcy services except as follows: ☐ See attached page

9. Bonus requested (final fee applications only): \$ \_\_\_\_\_  
(attach Declaration and Memorandum of Points and Authorities justifying bonus)

10. **TOTAL FEES REQUESTED THIS APPLICATION:** \$ \_\_\_\_\_

11. Total expenses paid to Applicant to date (including retainers and prior approved expense applications): \$ \_\_\_\_\_

12. **Summary of Requested Expense Reimbursement:** (attach detailed supporting documentation to this Application)

Type of Expense	Reimbursement Requested this Application
a. <b>please see Dk. No. 1889</b>	\$
b.	\$
c.	\$
d.	\$
e.	\$
f.	\$
g. <input type="checkbox"/> Continued on Attached Page	

13. **TOTAL EXPENSE REIMBURSEMENT REQUESTED THIS APPLICATION:** \$

14. Applicant submits the following in support of the Application herein pursuant to LBR 2016-1 (specify):

Declaration of Robert F. Bicher (attached) and Declaration of Richard A. Marshack (filed separately)



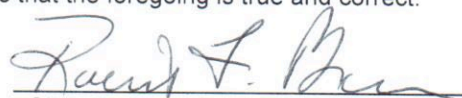
15. Total number of attached pages of supporting documentation: **10**

16. Applicant declares under penalty of perjury under the laws of the United States that the foregoing Application and all attached supporting documentation are true and correct and accurately reflect services rendered and expenses incurred.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

12/19/2024  
Date

Robert F. Bicher  
Printed Name

  
Signature

This form is optional. It has been approved for use in the United States Bankruptcy Court for the Central District of California.

**DECLARATION OF ROBERT F. BICHER**

I, Robert F. Bicher, declare:

A. The matters stated herein are within my personal knowledge and, if called upon as a witness, I could and would competently testify as to the truth of the matters set forth herein, except those matters set forth on information and belief, as to which I am informed and believe they are true.

B. I am a Principal with Robert F. Bicher & Associates ( the “Firm”), and current Field Agent and Forensic Analyst for the Chapter 7 Trustee, Richard A. Marshack. At the Trustee’s request, I file this supplement (“Supplement”), to my final fee application (“Final Fee Application”) filed on November 7, 2024 as Dk. No. 1889. The Supplement is filed to include \$2,730.00 in additional fees for preparing the Final Fee Application that occurred subsequent to September 23, 2024.

C. Statement of Facts.

On December 19, 2024 I was contacted by Pam Kraus, Trustee’s Administrator in this case, regarding a supplemental filing to our Final Fee Application to include time expended after September 23, 2024 in preparing the Firm’s final fee application. The Firm was previously directed to include time only through September 23, 2024 for the Final Fee Application.

D. Summary Statement of Services Rendered.

I attach hereafter as Exhibit 1 (see below) a detailed description of all the time spent preparing the final fee application for this case, subsequent to September 23, 2024. The services which the Firm rendered, and the billed hours for which the Firm requests compensation in this supplement, are categorized as follows:

(1) Fee Applications

Robert F. Bicher: 7.9 hrs.

1 E. Detailed Listing of All Time Spent by Professional on Matters for Which  
2 Compensation is Sought:

3 See Exhibit "1", attached hereto, for a detailed description of the time spent on this  
4 matter.

5 F. Hourly Rates:

6 Fee Applications:

7 Robert F. Bicher, \$300.00 per hour.

8 Total Fee Application Hours: 7.9 hrs. for \$2,370.00

9 Average Hourly Rate: \$300.00.

10 G. Request for Final Fee Application Period

11

Revised Final Request	Paid	Balance Due
12 Fees: \$18,142.00	\$729.60	\$ 17,412.40
13 Costs: \$ 15.00	\$15.00	\$0

14  
15  
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17 N. The Applicant has reviewed LBR 2016-1 and Has Complied with it.

18 I have read Local Bankruptcy Rule 2016-1 and complied with it.

19 I declare under penalty of perjury under the laws of the United States that the  
20 foregoing is true and correct to the best of my knowledge. Executed this 19<sup>th</sup> day of December  
21 2024, at Redlands, California.

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23 

24 Robert F. Bicher  
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**EXHIBIT 1**

## AB CAPITAL FEE DETAIL

DATE	TASK	DESCRIPTION	RATE	HOURS	TOTAL
09/24/24	Fee App RB	T/c from E Hays and R Marshack re reduction of fees	300.00	0.10	\$ 30.00
10/02/24	Fee App RB	Email to P Kraus re copy of entered order on 1st Interim Fee Application	300.00	0.10	\$ 30.00
10/02/24	Fee App RB	Review P Kraus email and attached email chain re estimate of fees for final fee application	300.00	0.10	\$ 30.00
10/02/24	Fee App RB	T/c to P Kraus re estimate for final fee application	300.00	0.10	\$ 30.00
10/02/24	Fee App RB	T/c and email to Y Lissebeck re estimate for final fee application	300.00	0.10	\$ 30.00
10/03/24	Fee App RB	Review Y Lissebeck and P Kraus emails re final fee application	300.00	0.10	\$ 30.00
10/03/24	Fee App RB	Review 8/1/24-9/23/24 fee detail, reconcile paid and unpaid agent and claims fees, estimate fees, and email to Y Lissebeck re estimate	300.00	0.60	\$ 180.00
10/03/24	Fee App RB	Review email and attached entered order on interim fee application and reply	300.00	0.10	\$ 30.00
10/03/24	Fee App RB	Review and reply to R Marshack email re final fee application	300.00	0.10	\$ 30.00
10/09/24	Fee App RB	Review 8/1/24-9/24/24 fee detail and prepare summary schedule of fees and expenses	300.00	0.70	\$ 210.00
10/10/24	Fee App RB	Prepare draft Form F-2016 for final fee application	300.00	0.60	\$ 180.00
10/21/24	Fee App RB	T/c to P Kraus re final fee application	300.00	0.10	\$ 30.00
10/22/24	Fee App RB	T/c from P Kraus re final fee application	300.00	0.10	\$ 30.00
10/29/24	Fee App RB	Review Y Lissebeck and N Rapoport emails re final fee application hearing and filing dates	300.00	0.10	\$ 30.00
10/29/24	Fee App RB	Emails with P Kraus re final fee application hearing and filing dates	300.00	0.10	\$ 30.00
10/30/24	Fee App RB	Review fee detail and draft declaration for final fee application	300.00	2.00	\$ 600.00
10/30/24	Fee App RB	Review and revise draft declaration	300.00	0.30	\$ 90.00
10/30/24	Fee App RB	Complete Form F-2016	300.00	0.50	\$ 150.00
10/31/24	Fee App RB	Emails with P. Kraus re final fee application	300.00	0.20	\$ 60.00
10/31/24	Fee App RB	Email to Y Lissebeck re final fee application amount	300.00	0.10	\$ 30.00

AB CAPITAL FEE DETAIL

10/31/24	Fee App RB	Email to P. Kraus re executed declaration	300.00	0.10	\$ 30.00
10/31/24	Fee App RB	Email from N Rapoport re fee application files to Legal Decoder and reply	300.00	0.10	\$ 30.00
10/31/24	Fee App RB	Emails with P Kraus re final fee application documents to Legal Decoder	300.00	0.10	\$ 30.00
11/01/24	Fee App RB	Email from Y Lissebeck re breakdown of fees and cost and reply	300.00	0.10	\$ 30.00
11/04/24	Fee App RB	Email and T/c with P Kraus re expenses requested for final fee application	300.00	0.10	\$ 30.00
11/04/24	Fee App RB	Email from P Kraus re attached final fee application for review	300.00	0.20	\$ 60.00
11/04/24	Fee App RB	T/c from P Kraus re revisions for final fee application	300.00	0.10	\$ 30.00
11/04/24	Fee App RB	Revise fee and expense detail, declaration, and Form F-2016 for final fee application and email to P Kraus	300.00	0.80	\$ 240.00
11/05/24	Fee App RB	Review P Kraus emails re process for post confirmation fees and review process	300.00	0.10	\$ 30.00
		Total Hours Billed and Total Amount		7.90	\$ 2,370.00



## PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is:  
870 Roosevelt, Irvine, CA 92620

A true and correct copy of the foregoing document entitled (*specify*): **SUPPLEMENT TO SECOND AND FINAL FEE APPLICATION FOR BICHER & ASSOCIATES** will be served or was served **(a)** on the judge in chambers in the form and manner required by LBR 5005-2(d); and **(b)** in the manner stated below:

**1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF):** Pursuant to controlling General Orders and LBR, the foregoing document will be served by the court via NEF and hyperlink to the document. On **December 19, 2024**, I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following persons are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below:

☒ Service information continued on attached page

**2. SERVED BY UNITED STATES MAIL:** On       , I served the following persons and/or entities at the last known addresses in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States mail, first class, postage prepaid, and addressed as follows. Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed.

**DEBTOR – MAIL REDIRECTED TO TRUSTEE**

THE LITIGATION PRACTICE GROUP P.C.  
17542 17TH ST  
SUITE 100  
TUSTIN, CA 92780-1984

☐ Service information continued on attached page

**3. SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE TRANSMISSION OR EMAIL:** Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on **December 19, 2024**, I served the following persons and/or entities by personal delivery, overnight mail service, or (for those who consented in writing to such service method), by facsimile transmission and/or email as follows. Listing the judge here constitutes a declaration that personal delivery on, or overnight mail to, the judge will be completed no later than 24 hours after the document is filed.

**VIA PERSONAL DELIVERY:**

HONORABLE SCOTT C. CLARKSON  
UNITED STATES BANKRUPTCY COURT  
RONALD REAGAN FEDERAL BUILDING AND COURTHOUSE  
411 WEST FOURTH STREET, SUITE 5130 / COURTROOM 5C  
SANTA ANA, CA 92701-4593

☐ Service information continued on attached page

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

December 19, 2024  
Date

Pamela Kraus  
Printed Name

/s/ Pamela Kraus  
Signature

1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF): continued

- **INTERESTED PARTY COURTESY NEF:** Kyra E Andrassy kandrassy@raineslaw.com, bclark@raineslaw.com;jfisher@raineslaw.com
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